



**STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
401 CHURCH STREET
L & C ANNEX 6TH FLOOR
NASHVILLE TN 37243**

April 13, 2012

Attn: Kathy Glapa
Governor's Environmental Stewardship Awards
Tennessee Department of Environment and Conservation
Office of Environmental Assistance
8th Floor, L&C Tower
401 Church Street
Nashville, TN 37243

**Subject: East Tennessee Natural Gas, LLC, Northeastern Tennessee Project (NET)
NPDES Permit Number TN0081183
Sullivan, Greene, Hawkins, and Washington Counties, Tennessee**

Dear Ms. Glapa:

On November 16, 1990, and in December 1999, EPA issued regulations that require facilities that disturb one or more acres of soil as part of construction activity to obtain a permit to discharge stormwater runoff. The Division of Water Pollution Control (division) regulates construction stormwater runoff primarily under the General NPDES Permit for Discharges of Stormwater Associated with Construction Activities (CGP), Permit Number TNR100000. The rationale for the CGP gives the following explanation for the importance of managing construction stormwater runoff.

Disturbed soil, if not managed properly, can be washed off-site during storms. Unless proper erosion prevention and sediment controls are used for construction activities, silt transport to local surface water is likely. Excessive silt in waterways causes adverse impacts due to biological alterations, reduced passage in rivers and streams, higher drinking water treatment costs for removing the sediment, and the alteration of water's physical/chemical properties, resulting in degradation of its quality. This degradation process is known as "siltation".

Historically, silt has been one of the primary pollutants in Tennessee waterways.

The CGP prohibits facilities from disturbing more than 50 acres of soil at a time. Periodically, the division sees some construction projects that, due to their nature, are not able to maintain less than 50 acres of soil disturbance at a time. In these cases, the facilities are required to obtain an individual NPDES permit for construction stormwater discharges. In the past three years the division has issued five such permits, including one to East Tennessee Natural Gas, LLC (ETNG) for their Northeastern Tennessee Project (NET).

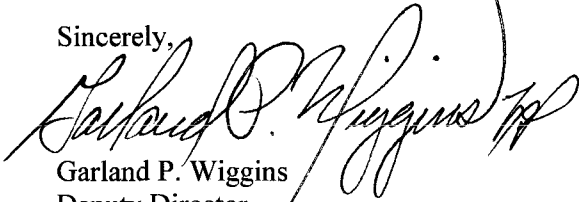
As part of ETNG's permit application they were required to submit a stormwater pollution prevention plan (SWPPP) to demonstrate how they would manage discharges of construction stormwater runoff to ensure that they would not contribute to pollution of waters of the state. ETNG and their consultants worked with division staff to ensure that their construction plans and SWPPP met the division's minimum requirements. They then added further controls to ensure that their project had as little impact on waters of the state as possible; this additional level of control likely prevented many problems that the division would normally see on a project of this nature.

Over the course of this construction project division staff visited the project site on several occasions. No major problems were noted as part of the division's inspections and ETNG was always very responsive to making any adjustments that were recommended by division staff. In addition, the division only received two relatively minor complaints regarding this project and both of those complaints were very quickly resolved. For a project of this size, constructed on such extreme and varied topography, and on a short timeline, it is truly remarkable how well the project went.

The division is very pleased and impressed with the job that ETNG did on this project. ETNG's attention to detail and care for protecting waters of the state is unprecedented in a project of this scope. We support their application for an Environmental Stewardship Award and wish to recognize the remarkable job that they did protecting the natural resources of the state.

If you have questions, please contact Ms. Erin O'Brien at (615) 253-2245 or by E-mail at Erin.O'Brien@tn.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Garland P. Wiggins". The signature is fluid and cursive, with a large initial "G" and "W".

Garland P. Wiggins
Deputy Director

CC: DWPC, Permit Section
DWPC, Johnson City Environmental Field Office, Attn: Mike.McClelland@tn.gov